To: Patel, Manojkumar[patel.manojkumar@epa.gov]
Cc: Letuchy, Alexandra[letuchy.alexandra@epa.gov]; Scott Mounts[Scott.Mounts@greif.com]
From: Geoff Westphal
Sent: Tue 7/11/2017 5:30:34 PM
Subject: RE: CLCM - St. Francis

Hi Manoj-

I just heard your voicemail and now saw this email. Scott Mounts and I will call using the information below at 2:00 PM CST. Talk to you then!

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From: Patel, Manojkumar [mailto:patel.manojkumar@epa.gov]
Sent: Tuesday, July 11, 2017 12:44 PM
To: Geoff Westphal
Cc: Letuchy, Alexandra; Patel, Manojkumar
Subject: RE: CLCM - St. Francis

Geoff,

Below is our conference call info:

Date: 7/11/2017 at 2 PM CST

Conference Call No. (866)299-3188

Code: 7729229

Sasha and I look forward to meeting with you on the call at 2 PM CST. Thanks.

Manoj P. Patel, Environmental Engineer

Air Enforcement and Compliance Assurance Branch (MI/WI)

Environmental Protection Agency, Region 5

(312)353-3565 Office

Patel.manojkumar@epa.gov

From: Geoff Westphal [mailto:Geoff.Westphal@greif.com]
Sent: Friday, July 7, 2017 2:19 PM
To: Patel, Manojkumar <patel.manojkumar@epa.gov>
Subject: CLCM - St. Francis

Hi Manoj-

Thank you for your time and assistance as we work toward a scope of work that achieves EPA's objectives in the context of our operations. Per our discussion yesterday, here is the information we received from PACE Analytical regarding test methods to be employed and turnaround time (TAT):

"For aqueous samples we use Method 8270 for SVOC and Method 8260 for VOC. Standard turn-around time is 10 business days. Over 20 samples would take 15 days on standard TAT. For quick turn we may be able to provide 5 day TAT for 20 or fewer samples. Please note that matrix interferences are common on process waters, which may make re-runs necessary, taking more time.

Please contact us a day or two before sample collection to confirm the availability of quick TAT."

We are planning on taking between 20 and 25 samples, but this is subject to change based on the plant manager's input. Mark Furgason, the plant manager, is on vacation until next Thursday (13th). The samples will be taken once he returns as his process knowledge is necessary for this project.

To briefly recap our discussion from yesterday, we see the water sampling as step one toward properly quantifying potential VOC emissions coming from our process. There are two primary reasons we see this as our first step:

1. We want to determine if VOCs are present in our water. This is the potential source of VOCs that would be directed to the scrubber because the units you requested be tested are those routed to the scrubber, and it is through these units our wash water is recirculated. The water we will be sampling is likely representative since it is recirculated until it is too dirty to be used, therefore it is a broader snapshot of our operations. If after analysis there are no VOCs in what we think is the most likely source of potential VOCs in our process, it would alter our approach. Also, until the presence of VOCs is identified, any sort of capture testing is premature, and as we discussed, not likely to capture the full range of emissions from the operations over time.

2. If VOCs are identified, this sampling will also provide us with the information necessary to develop the test protocol, including which methods would be employed in our source testing efforts. It's my understanding we would need to provide these methods in our proposed protocol, which is why we don't believe we can prepare an accurate protocol prior to sampling.

We also believe this information will provide more accurate information about potential VOC emissions than the requested customer list or any pre-test survey, since that information does not identify actual potential sources of VOCs.

We are taking a systematic approach to ensure we have a methodology all parties agree with, and that we obtain valuable data for determining next steps. We want to be thoughtful with our actions to ensure both accuracy and cost-effectiveness with our approach.

Once sampling is complete, I will provide to you the number of samples taken as well as sampling locations. I will contact you once results are received so we can discuss prior to developing our protocol. In addition, given the response from the lab in terms of TAT, I will keep you updated in case they run into issues and it extends the length of time required to process the samples. Please let me know if you have any questions or issues with what's been proposed. I want to ensure transparency and that we are meeting expectations going forward on this project.

Finally, I also want to communicate to you that we are taking the potential VOC quantification issue seriously and understand the importance of this project. We want to do what's right, and will continue to work with you in pursuit of that goal. Thanks and have a great weekend.

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